

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

REGIS MURPHY, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THE AUTO CLUB GROUP,

Defendant.

Case No. 5:24-cv-11168-JEL-CI

Hon. Judith Ellen Levy

Magistrate Judge Curtis Ivy, Jr.

**NOTICE OF SETTLEMENT AND REQUEST TO VACATE DISCOVERY
DEADLINES**

The Auto Club Group (“Defendant”) and Regis Murphy (“Plaintiff”) by and through undersigned counsel, pursuant to Local Rule 41.1 submit this Joint Notice of Settlement to alert the Court that the Parties reached an agreement in principle to settle Plaintiff’s claims on behalf of similarly situated individuals at a private mediation on February 24, 2025. In light of this development the Parties jointly request an Order vacating the pending deadlines with leave to file a motion for preliminary approval. In support of this request, the Parties state as follows:

1. On February 24, 2025, the Parties attended a virtual mediation with an established neutral mediator, Scott Callen, during which the Parties reached an agreement in principle to settle (“Settlement”) Plaintiff’s claims on behalf of similarly situated individuals concerning late and/or deficient COBRA notices.

2. In light of the Settlement, the Parties agree and respectfully submit that vacating the pending deadlines preserves judicial economy and promotes efficiency by permitting the Parties sufficient time to focus on documenting the Settlement in the form of a written agreement and proceeding with the settlement approval process under Rule 23 of the Federal Rules of Civil Procedure.

3. Accordingly, the Parties respectfully request that the Court vacate the deadlines set by the Scheduling Order (ECF No. 19) and grant Plaintiff's counsel leave to file a motion for preliminary approval of the proposed settlement on or before April 25, 2025.

4. The Parties are available to address any questions that Court may have in connection with its consideration of this Notice and Joint Motion.

Dated: February 26, 2025

/s/Eric Lechtzin

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CERTIFICATE OF SERVICE

The undersigned certifies that on February 26, 2025, the foregoing pleading was filed using the Court's CM/ECF system which sent notice of its filing to all counsel of record.

/s/Stacey C.S. Cerrone

Stacey C.S. Cerrone